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MEMO ENDORSED

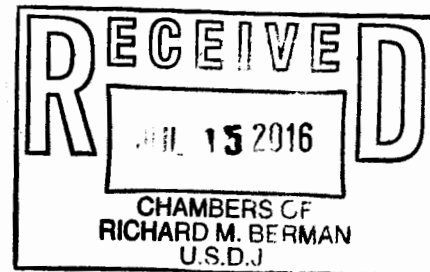
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July 14, 2016

VIA ECF AND HAND DELIVERY

Honorable Judge Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 12D  
New York, NY 10007



Re: United States v. Reza Zarrab, et al.,  
SI 15 Cr. 867 (RMB)

Dear Judge Berman:

We write pursuant to Rule 2(C) of the Court's Individual Practices to seek permission to file a memorandum in support of Mr. Zarrab's motion to dismiss the Superseding Indictment in excess of 25 pages. We believe a brief of no more than 50 pages is necessary to adequately address the complex legal questions at issue on this motion. Mr. Zarrab's motion to dismiss is due July 15, 2016, when he will also file a separate motion to suppress.

The Superseding Indictment charges four separate counts of conspiracy, to: (1) defraud the United States; (2) violate the International Emergency Economic Powers Act; (3) commit bank fraud; and (4) commit money laundering. Dkt. No. 7. Mr. Zarrab will move to dismiss all counts of the Superseding Indictment. We have been working diligently to distill each argument, but we believe a brief of 50 pages is required to provide analysis sufficient to address the complex legal issues in this motion.

We have attempted to contact counsel for the government regarding this matter but have been unsuccessful. We have received messages this week that both AUSAs Michael Lockard and Sid Kamaraju are out of the office.

Respectfully submitted,

/s/ Christine H. Chung  
Christine H. Chung

cc: All counsel of record (by ECF)

quinn emanuel urquhart & sullivan, llp

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SO ORDERED

Date: 7/15/16

Richard M. Berman, U.S.D.J.

\* 1.0. more than adequate.

The Court's experience is that 25pp is the correct number. We will authorize an additional 10 pp to each side for their main motion to dismiss briefs. Standard page limits apply to other motions, replies, etc.